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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

THE CITY AND COUNTY OF SAN  
FRANCISCO, CALIFORNIA and THE PEOPLE  
OF THE STATE OF CALIFORNIA, Acting by  
and through San Francisco City Attorney DENNIS  
J. HERRERA,

Plaintiffs,

v.

PURDUE PHARMA L.P., et al.

Defendants.

Case No. 3:18-cv-07591-CRB-JSC

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE DISCOVERY  
CONFERENCE**

Pursuant to Civil Local Rule 7-12, the People of the State of California, acting by and through San Francisco City Attorney Dennis J. Herrera, (“the People”), together with Defendants McKesson Corporation, AmerisourceBergen Drug Corporation, Cardinal Health, Inc., Walgreen Co., Teva Pharmaceuticals USA, Inc, Teva Pharmaceutical Industries Ltd., Cephalon, Inc., Actavis LLC, Watson Laboratories, Inc., Actavis Pharma, Inc. f/k/a Watson Pharma, Inc, Endo Pharmaceuticals Inc., Endo Health Solutions Inc., Endo International plc, Par Pharmaceutical, Inc., Par Pharmaceutical Companies, Inc., Johnson & Johnson and its subsidiary Janssen Pharmaceuticals Inc. f/k/a as Ortho-McNeil-Janssen Pharmaceuticals, Inc. and Janssen Pharmaceutica, Inc., Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a/ Watson Pharmaceuticals, Inc., Allergan Sales, LLC, Allergan USA, Inc., Warner Chilcott Company, LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis Kadian LLC, Actavis Totowa LLC, Actavis South Atlantic LLC, Allergan plc, Actavis Laboratories UT, Inc., Actavis Laboratories FL, Inc., Anda, Inc., and Noramco, Inc. (collectively, “Defendants”), hereby stipulate and agree as follows:

1) The parties are scheduled to appear for a discovery conference on December 11, 2020.

2) On November 17, 2020, the Court issued its Discovery Order No. 2, which, *inter alia*, set forth a protocol for meeting and conferring before raising discovery disputes before the Court. *See* Docket 382. That protocol outlines a process spanning a minimum of 11 business days between an initial video meeting between the parties and the submission of a joint statement to the Court. *Id.* at 3.

3) The parties anticipate raising certain disputes at the next discovery hearing and have discussed a schedule for meeting and conferring pursuant to the Court’s protocol. Based on a hearing date of December 11, the parties understand that the protocol would require an initial meeting no later than Monday, November 23 and the transmission of the moving party’s letter brief no later than Friday, November 27. The order also provided that the parties should meet and confer regarding specific issues brought to the Court’s attention by November 23 and that the parties should raise any disputes regarding those issues according to the same protocol.

1           4)     In order to allow the parties additional time to negotiate pending discovery  
 2 disputes, and in light of the intervening Thanksgiving holiday on November 26, the parties  
 3 request that the Court continue the December 11 hearing to December 18, 2020, at 9:00 a.m., a  
 4 date and time the parties understand is convenient to the Court. The parties further request that  
 5 the Court extend to November 30, 2020, the deadline for meeting and conferring on the issues  
 6 for which the order set a deadline of November 23.

7           IT IS SO STIPULATED.

8  
 9           DATED: November 19, 2020

Respectfully submitted,

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## **ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from the above signatories.

Dated: November 19, 2020

By: /s/ August Gugelmann

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that, on November 19, 2020, service of this document was accomplished  
3 pursuant to the Court's electronic filing procedures by filing this document through the ECF  
4 system.

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6                   */s/ August Gugelmann* \_\_\_\_\_

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1 **PROPOSED ORDER**

2 PURSUANT TO STIPULATION, IT IS SO ORDERED. The December 11, 2020  
3 hearing is continued to December 18, 2020, at 9:00 a.m. The deadline for the parties to meet and  
4 confer regarding issues for which the Court's Discovery Order No. 2 set a deadline of November  
5 23 is continued to November 30, 2020.

6  
7 Dated: November 20, 2020

  
8 Hon. Jacqueline Scott Corley  
United States Magistrate Judge

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